

November 13, 2015

Federal Communications Commission
Attn: Office of the Secretary
445 12th Street SW
Washington, DC 20554

**RE: Request for Waiver of Invoice Deadline Extension
CC Docket No. 02-6**

I am asking that the deadline for an Invoice Deadline Extension Request be waived for **Fruitland School District, BEN 142706**, as it's a result of a clerical error made by someone not actively involved in the E-Rate process. There are E-Rate funds in the amount of \$270.16 (January-June 2015 payments) that still have yet to be disbursed for **FRN 2559819, Form 471 937194**.

I am an E-Rate Consultant in Oregon and I process and file E-Rate forms for about 80 school districts. I am responsible for filing all E-Rate forms that are required by USAC including Form 470, Form 471, Form 486 and Form 472 (BEAR). I also handle all reviews and appeals. I am the only person in this position as my company recently had to make some staff changes and I no longer have a part time assistant to assist me once the busy season hits. I was busier than usual this year between submitting documentation for Form 471 reviews, filing appeals and processing reimbursements, I also had to assist districts' authorized signers in getting logged into their EPC accounts and add me as a user with full rights.

Because there were numerous tasks that required immediate attention, my supervisor felt I could use some extra help and got someone to assist me with processing and submitting 2014-15 BEAR forms. After the forms had been submitted, I ended up finding several mistakes the assistant had made. Which, most of them were thankfully caught before they were certified by the vendor which included misspelled words, incorrect district name but the rest of the information was attached to a completely different district, transposed numbers, post discount amounts being input into the pre discount amount column, etc. However, there was two BEAR forms that had been certified by the vendor and approved for payment by USAC. The payments had already been disbursed to the vendor, so I contacted the vendor to have them send the improperly disbursed funds back to USAC. It was at this point, that I decided to not have the assistant continue working on reimbursements.

Every year, I run an audit of reimbursements to make sure that everything has been filed and nothing was missed. Unfortunately, I was not able to start this project until after 9:00 pm (PST) on the invoice deadline day of October 28th, 2015, as I had been busy during the week tracking down some service providers that had not yet certified BEAR forms and resubmitting forms. After I completed the audit, I discovered that FRN 2559819 for Fruitland School District, BEN 142706, did not have funds disbursed for January-June 2015 amounts, but funds had been disbursed for July-December 2014. After viewing the BEAR Notification Letter, dated September 10, 2015, I soon discovered what had happened. I noticed

FRN 2559818, was listed on the notification letter twice; however, FRN 2559819 was not listed. I realized my assistant had been the person that submitted the reimbursement forms for Fruitland School District and had made the clerical error on the BEAR form. My spreadsheet showed the amount that was requested for FRN 2559819 (\$270.15), but it had never actually been included on the BEAR form that was submitted by my assistant on 8/28/2015, SLD invoice #2233881, instead FRN 2559818 was mistakenly included twice.

Due to the fact that I am the only person in this position and had an unexpected increase in the volume of work with USAC's decision to launch the new EPC portal and that this was not only a clerical error but was an error made by someone that is not actively and consistently involved in the E-Rate process, I ask that you please consider my request for waiver of the invoice deadline extension request. Ensuring that all districts receive the E-Rate funds that are due to them is something I take very seriously and is very important to me. In the four years I have worked in this position, I have yet to miss a deadline, so I take pride in what I do. I don't want to see a school district miss out on funding due to a clerical error made by my assistant. The districts put a lot of trust in me and I am always strive to make sure everything is completed in a timely manner

It is for these reasons above that I am requesting the waiver of the invoice deadline extension so that I may file an invoice deadline extension request with USAC and then, if approved, submit a BEAR form for FRN 2559819 in the amount of \$270.15. I thank you in advance for your consideration in this matter and look forward to hearing from you soon.

Sincerely,

A handwritten signature in black ink that reads "Casey Seeger". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Casey Seeger, E-Rate Program Specialist
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